

ER ID 11810



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

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ES&H DIVISION-LA/O

NOV 19 1992

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OCT 16 1992

Mr. Jerry L. Bellows
Area Manager
Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

Re: RFI Work Plan for OU 1071
Los Alamos National Laboratory
NMO890010515

Dear Mr. Bellows:

The Environmental Protection Agency has completed a review of the RCRA Facility Investigation (RFI) Work Plan for the Operable Unit 1071 (OU 1071), and has found the work plan to be deficient. You have thirty (30) days from receipt of this letter to address the enclosed list of deficiencies.

Stylistically, the RFI Work Plan for OU 1071 has been more clearly written than the previous work plans reviewed.

Note

As part of the ongoing RCRA Facility Assessment (RFA) conducted by LANL, the following Solid Waste Management Units (SWMUs) do not appear to require an RFI; therefore, the permit does not need to be modified to include them:

- SWMU 0-008 (North Mesa Disposal Area)
- SWMU 0-010 (Surface Disposal Area)
- SWMU 0-015 (Active Sportsmen's Club Firing Range)
- SWMU 0-025 (Tank Mesa "Landfill")
- SWMU 0-026 (Gun Mount "Landfill")
- SWMU 0-035(a) (Surface Disposal)



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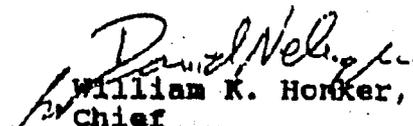
US DOE/LA/O

1992-10-16 10:00 AM

In addition, a Class III modification may be pursued to remove SWMU 0-005 (Mortandad Canyon "Landfill") from the permit.

Should you have any questions or require additional information, please contact Barbara Driscoll at (214) 655-6785.

Sincerely,


William K. Honker, P.E.
Chief
RCRA Permits Branch (6H-P)

Enclosure

cc: Benito Garcia, NMED
Al Tiedman, LANL

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List of Deficiencies

Specific Comments

Figure 5-70. Screening and analysis of initial investigations at SWMU Group 19-1. - SWMU Group 19-1 (East Gate Laboratory) pp. 5-143 through 5-155 - All samples should be analyzed for Semivolatile and TAL Metals for Sample Locations 19-002, 19-001 and 19-003 rather than only analyzing 50 % of the samples for these hazardous constituents.

Chapter 6, SWMUs Proposed for No Further Action:

SWMU 0-024 (Cistern on Barranca Mesa) p. 6-3 - Provide the documentation for Aldrich 1991 as to removal of contents of the cistern.

Areas of Concern C-73-001 through C-73-004 - Provide some documentation of removal of tanks and any testing for contamination.

Annex I - Table I-2 p. I-7 through I-9 - Several RFI phase reports are listed as being completed in 1995, it would be preferable if some of these reports were combined into one submittal rather than numerous submittals.